



Review of Aircraft Noise Information  
Presentation and Complaint  
Resolution: Perth  
November 2011

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## Executive summary

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In establishing the role of the Aircraft Noise Ombudsman (ANO), the Government stated in their Aviation White Paper that the Ombudsman will “monitor Airservices’... presentation of noise information with a view of continuing to improve the flow of information to the affected communities”. This Review is directed specifically at this matter in the context of Perth, from where over a quarter of all complaints to the ANO office have originated.

From the analysis undertaken in this review, including meetings with complainants from Perth, it is clear that the public are interested in understanding in simple terms what the aircraft noise situation is, will be, and what, if anything, can be done to improve the noise situation in their area. They are seeking accountability from those in Government and the aviation industry who have the ability to make decisions that affect aircraft noise.

Given its role as air navigation service provider, Airservices Australia (Airservices) is a key determiner of the aircraft noise situation around Perth Airport through its decisions about aircraft flight paths, arrival/departure procedures, the location of navigational infrastructure, and the provision of air traffic services. Additionally, through its aircraft noise management role, as assigned by Ministerial Direction, it is also the holder of key aircraft noise information, including the Noise and Flight Path Monitoring System data and noise complaints data.

Airservices has commenced a program of significant reform of its presentation of aircraft noise information. This review makes recommendations (see Attachment 1) intended to contribute to and support Airservices’ efforts to improve public understanding about aircraft noise by improving its presentation of information and taking accountability for the decisions it makes (including decisions not to make a change) that affect the aircraft noise situation. Without clear and accurate information readily available and presented in ways that enable members of the public to understand the outcomes of decisions, accountability is not clear and the public cannot engage productively in a debate about the issues.

In addition to its own efforts to improve the delivery of information about aircraft noise, Airservices and the Airports Association of Australia (AAA) have initiated efforts to deliver coordinated, industry wide information on the subject. This is an important and potentially very useful initiative that both Airservices and the AAA should continue to pursue.

While the focus of this review was Perth, almost all of the recommendations have relevance to other areas affected by aircraft noise. Airservices is encouraged to apply these recommendations across their business as relevant, perhaps using the Perth environment as a useful test-bed for first implementations. This is consistent with the work Airservices is currently undertaking in improving noise information presentation nationally.

# 1 Introduction

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In the nine months from commencement in September 2010 to the end of June 2011, the ANO office received 100 complaints. Of these, exactly a quarter came from Perth residents. Recurring themes in these individual complaints pointed to systemic issues in two aspects of aircraft noise management:

1. public understanding and information about aircraft noise
2. complaint resolution, including the identification and management of improvements to aircraft noise outcomes

From early in this period the ANO office identified individual complaints that would be best addressed through a targeted review of the issues in Perth. Following further research and consultation the Terms of Reference (see Attachment 2) were developed, and published in early August 2011.

The review makes recommendations that address the Review Objectives, identifying both immediate opportunities for improvement, and structural, medium-term reform activities that may ultimately deliver improved noise management outcomes.

In line with the ANO Charter, the review has focussed on the handling of complaints, information, and consultation, not on redesigning airspace or reviewing air traffic management. While the context has been Perth, many of the findings have broader application.

## 1.1 Review methodology

In conducting this review, the ANO has drawn upon the following sources of information:

- ANO complainant case files and submissions made to the review by Perth residents
- Discussions with staff and management in communications, consultation and complaint related roles within Airservices
- Discussions with Perth residents, aviation stakeholders, including Airport owners and operators, local councillors, a federal MP
- International and Australian websites and publications that present information about aircraft noise
- Perth-based opinion web-logs and media publications with ensuing community comments
- Studies and documents about aircraft noise, including the *Senate Rural and Regional Affairs and Transport References Committee Inquiry on the effectiveness of Airservices Australia's Management of Aircraft Noise* (Senate Inquiry) and the Government's Response, the Aviation White Paper and other federal departmental publications, and WA Government planning commission publications.

Each ANO complaint or submission has been reviewed with issues identified and classified into key themes. While concerns are often raised from an individual and personal perspective, the recurring themes clearly point to underlying systemic issues. In addition, submissions to the Senate Inquiry, and contributions to web-logs about aircraft noise, have given further insight to the levels of public understanding and concern about aircraft noise information and complaint resolution.

Some issues that relate directly to Airservices' complaint response have already been considered in the ANO's *Review of Complaints Handling: Airservices Australia February 2011 (Complaint Handling Review)*. The issues considered in this review extend and reinforce, but in no way diminish the findings of the *Complaint Handling Review*. In particular, recommendations 1, 2, 3, 7, 9b, 10, 12, 14, and 15 relate to information provision and complaint resolution. They are re-stated alongside any additional recommendations from this review, where applicable.

Adequate sampling has been undertaken to support the findings and recommendations of this review. Nevertheless, over time there will be further information and learning to be gained from continued engagement with complainants and this is likely to result in further suggestions for improvement. These will be provided to Airservices on an ongoing basis in response to individual complaints.

This review did not call for public submissions as there was already a large amount of material available that reflected the level of public understanding about aircraft noise and the views of complainants and other stakeholders about Airservices' complaint resolution and information presentation. Given this, it was not appropriate to incur the substantial delay that further public consultation would have imposed. It is important in this regard to note that the role of the Aircraft Noise Ombudsman is ongoing, and the reform of aircraft noise management will continue in response to further engagement with the public and other stakeholders.

Some approaches from the public through the ANO complaints handling system reflect frustration and anger, which can inhibit effective complaint handling. However, in the overwhelming majority of complaints received by the ANO, the tone and nature of the complaints are supportive and constructive, and have provided useful input into how the complainant experience could be enhanced. Furthermore, the open and willing participation of Airservices staff and other aviation stakeholders in their dealings with the ANO has provided valuable insight into the significant complexities that surround aircraft noise issues. These contributions have assisted greatly in developing a constructive set of recommendations.

## **1.2 Airservices' response to this review**

Airservices has supported the review by providing access to data and personnel. Airservices' commitment to improving information presentation and complaint resolution on aircraft noise issues has meant that, during this review, progress has been made in both these areas. In some instances this has removed the need for a recommendation, which might have been relevant a few months ago. Many of the recommendations of this review support actions that Airservices has already planned and is committed to implementing.

The Board of Airservices has accepted the seven recommendations contained in this report.

## **2 Improving information about aircraft noise issues**

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Under the Air Services Act 1995, paragraph 8(1)(d), Airservices has the function of carrying out activities to protect the environment from the effects of, and the effects associated with, the operation of aircraft. The Ministerial Direction M37/99 is explicit

about the activities required to fulfil this function, including provision of a Noise Enquiry Service, and the requirement to “provide advice, information and data on environmental aspects of air traffic management including aircraft movements, aircraft noise, aircraft engine emissions and aircraft operations”<sup>1</sup>,

Airservices acknowledges in its Environment Strategy 2011-16<sup>2</sup> that “...there are opportunities to improve the information provided to the community to make it more meaningful, informative, transparent and easy to understand.” Listed in the Environmental Action Plan of the Strategy document is a Current Action described as “[i]mprove noise monitoring and information services.” This report acknowledges the work already underway within Airservices and congratulates the organisation on the initiatives already implemented or in the process of implementation. This report is intended to contribute to and support this work.

## 2.1 Currently available information

Airservices currently undertakes various activities to inform the public around Perth Airport about aircraft noise. These include:

Information provision through:	Details
Noise Complaints and Information Service (NCIS) <sup>3</sup>	Receives and responds to enquiries made by internet lodgement, phone, email, post, and fax.
Reports	Noise and flight path monitoring system (NFPMS) reports published quarterly, containing technical data, graphs and tables representing results of monitoring over the quarter. Complaint statistics reports produced monthly, containing detailed (de-personalised) complaint information. Reports about specific activities/changes, for example the Western Australia Route Review Project (WARRP), the Review of Environmental Monitoring Units, and the new trial air route through Pearce airspace.
Webtrak	Internet-based display of near real-time aircraft movements around some airports; users can enter address details and see aircraft movements in their area. Users can lodge complaints through web on particular movements of concern.
Aircraft Noise website	References to regulations, principles and procedures, reports and other general information, links to projects.

<sup>1</sup> Ministerial Direction M37/99, 3 May 1999, *Activities to be performed by Airservices Australia under paragraph 8(1)(d), and for the purposes of subsection 9(2) of the Air Services Act 1995.*

<sup>2</sup> [http://www.airservicesaustralia.com/media/corporatepubs/docs/Environment\\_Strategy\\_2011-16.pdf](http://www.airservicesaustralia.com/media/corporatepubs/docs/Environment_Strategy_2011-16.pdf), accessed 16 September 2011

<sup>3</sup> Until October 2011, the NCIS was known as the Noise Enquiry Unit or NEU. Some quotes used in this report make reference to the NEU.

Information provision through:	Details
Participation and presentations at aviation-related community engagement forums	In particular, the Perth Airport Aircraft Noise Management Consultation Committee, and the soon to be established Perth Airport Community Aviation Consultation Group.

### 2.1.1 Noise Complaints and Information Service (NCIS)

The NCIS (until October 2011 called the Noise Enquiry Unit or NEU) is a key source of information for members of the community to develop an improved understanding of aviation and the aircraft noise impacts in their area. The ANO's *Complaint Handling Review* addressed Airservices' complaint handling, with provision of more targeted information being an important method of resolving complaints<sup>4</sup> and a recommendation that Airservices should "develop clear messages on key issues that provide a realistic picture of what is, and what is not, likely to be achievable."<sup>5</sup> These recommendations continue to be relevant in the Perth context.

### 2.1.2 Reports

Airservices currently provides the following reports about aircraft noise in Perth on its website:

- Noise and flight path monitoring system reports (noise monitoring reports): published quarterly, containing technical data, graphs, and tables representing results of monitoring over the quarter.
- Complaint statistics reports: produced monthly, containing complaint statistical information. (Separately an extract of the Noise Complaint Database containing a detailed (de-personalised) copy of each complaint recorded in the month is provided by the NCIS to Perth Airport management and Airservices management.)
- Reports about specific activities/changes, for example WARRP, the Review of Environmental Monitoring Units, and the new trial air route through Pearce airspace.

Each of these reports is reviewed in the following sections.

#### 2.1.2.1 Noise monitoring reports

The noise monitoring reports contain a statement of purpose as follows:

*This report provides a brief description of the system and the data it collects and processes. It also contains a summary of data collected in [Perth] over the quarter [January to March 2011] by the NFPMS.*

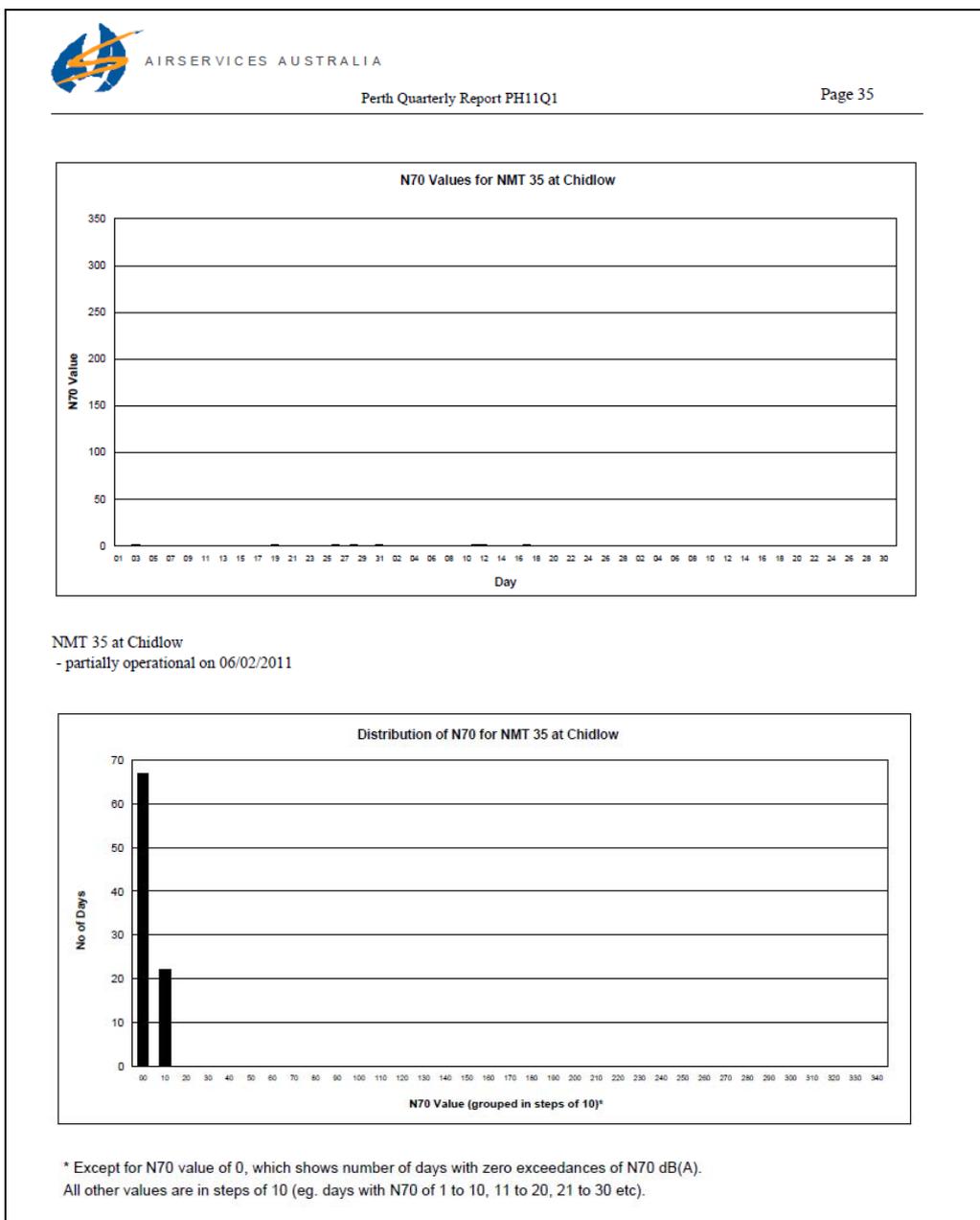
These reports contain a significant amount of technical data presenting the actual noise data recorded by the noise monitors Airservices has positioned around Perth Airport for the preceding quarter. The data is accurately presented and described in a range of tables and graphs, although some small changes would improve effectiveness:

- Graphs would be more effective if the scale is relevant to the data being presented – for example, the "N70 Values for NMT 35 at Chidlow" graph in the Perth noise monitoring report for January-March 2011 (see below). According to the 'Distribution of N70 for NMT 35 at Chidlow' graph that follows, there were about 22 days that

<sup>4</sup> See recommendation 2, *Review of Complaints Handling: Airservices Australia February 2011*

<sup>5</sup> See recommendation 14, *Review of Complaints Handling: Airservices Australia February 2011*

recorded at least 1 and up to 10 events at or above 70 dB(A), but the scale of this first graph does not make this visible.



- Technical terminology should be clearly explained in simple terms, and used consistently. For example, the “N70” value in Table 1 is described as follows: *N70 is calculated by dividing the total number of CNE equal to or greater than 70 dB(A) detected during the quarter by the number of days in the quarter that the NMT is in operation (Op Days)<sup>6</sup>*  
 In other words, the N70 value in Table 1 is a daily average across the quarter of how many times an aircraft flying over the particular noise monitor was recorded as being equal to or above 70 decibels. In Appendix B, the “N70” value is the number of times an aircraft flying over the particular noise monitor was recorded as being equal to or

<sup>6</sup> Taken from the Perth noise monitoring report for January-March 2011 ([http://www.airservicesaustralia.com/wp-content/uploads/Perth\\_2011\\_1st\\_Quarter.pdf](http://www.airservicesaustralia.com/wp-content/uploads/Perth_2011_1st_Quarter.pdf), accessed 9/11/2011). Note: ‘CNE’ stands for ‘Correlated Noise Events’, which means an instance of an aircraft overflying a monitor that has been matched by the computer software with reading on the monitor at the same time.

greater than 70 decibels – not averaged, yet the same term “N70” is used. Language such as “quarterly average N70” versus “N70” may be a more descriptive differentiation and may help a non-technical audience understand better what the data means.

- In cases where there is a wide variation in flights from one day to the next, averages may not provide a good representation of the ‘on the ground’ experience of aircraft noise – see case study below. Data presentations using averages should be reviewed and either ceased or explanations provided about the likelihood or otherwise of averages being representative of the aircraft noise experience ‘on the ground’.

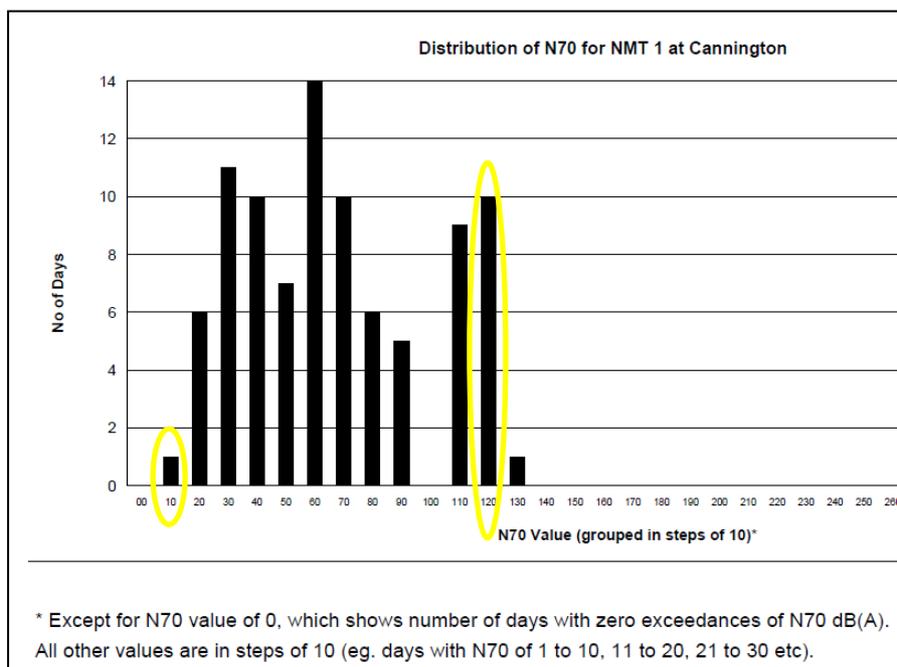
### Case Study: Averages don’t tell the whole story

NMT LOCATION (NMT NUMBER)	NOISE PARAMETERS	11Q1
Gibbs St Primary school Cannington (NMT 1)	LAeq 24hr (LAeq night), dBA	59.1 (54.3)
	Days	89.8
	CNE <sub>70</sub>	5,567
	CNE 24hr (CNE night)	10076 (1,513)
	<b>N70</b>	<b>62.0</b>
	N80	1.2
	N90	0.3

In the Perth noise monitoring report for the January-March 2011 quarter, the N70 value in Table 1 for the Cannington noise monitor (NMT 1) is 62.0 (see left). This figure is calculated by dividing the total number of times an aircraft over-flight of the Cannington noise monitor was recorded as being equal to or greater than 70 decibels by the number of days that the noise monitor was operational in the quarter (i.e., the “CNE<sub>70</sub>” value divided by the “Days” value<sup>7</sup>). This gives a daily average, which logically could be understood

to mean that each day there are approximately 62 flights that register more than 70 decibels overflying the noise monitor at Cannington.

However, the data in the first graph of Appendix E of the same report, ‘Distribution of N70 for NMT1 at Cannington’ (see right), shows that there was one day in the quarter when less than 10 flights over the Cannington noise monitor registered 70 decibels or more, and ten days where between 110 and 120 flights registered over 70 decibels (that is, close to double the daily average).



The text content of the noise monitoring reports describes how the noise monitoring system works and how the data is presented, but does not contain any discussion,

<sup>7</sup> CNE<sub>70</sub> stands for “Correlated Noise Event” with the 70 subscript reflecting that it is a subset of the correlated noise events that are equal to or greater than 70 decibels. “Days” are the number of days the noise monitor was operation during the quarter.

analysis, or conclusions about what may be understood from the data. Given Airservices' responsibility to "provide advice, information and data on environmental aspects of air traffic management including aircraft movements, aircraft noise, aircraft engine emissions and aircraft operations"<sup>8</sup>, there is a need for additional material that addresses the 'advice' and 'information' aspects, in addition to the comprehensive presentation of data. This is imperative not only for compliance reasons but as part of an effective noise management strategy that provides members of the public with comprehensible information and advice about aircraft noise.

Airservices states on its website that noise monitoring information is used for a number of purposes:

*The information collected is used to:*

- *determine the contribution of aircraft to overall noise exposure*
- *detect occurrences of excessive noise levels from aircraft operations*
- *assess the effects of operational and administrative procedures for noise control and compliance with these procedures*
- *assist in planning of airspace usage*
- *validate noise forecasts and forecasting techniques*
- *assist relevant authorities in land use planning for developments on areas in the vicinity of an airport*
- *generate reports and provide responses to questions from Government, industry organisations, community groups and individuals.*<sup>9</sup>

The current noise monitoring reports only present the data collected, with no discussion of the results of any subsequent analysis that demonstrates application of the data as described above. For example, addressing dot-point one above, the reports produced should contain explicit analysis of the contribution of aircraft to overall noise exposure, and how this has changed over time and why. Similarly, for dot-point two, reports should present a discussion of what constitutes an 'occurrence of excessive noise levels from aircraft operations', what number of such occurrences there have been in a period, how this is changing over time, and what this means for communities in the area.

The reports present complex presentations of technical data. The public's interest is in understanding what it all means for them. The analysis and discussion and, ultimately, the decisions being made on the basis of such analysis, are what affects the community and what Airservices is accountable for. Without this information readily available and presented in ways that enable members of the public to understand the outcomes of decisions, accountability is not clear and the public cannot engage productively in a debate about the issues.

Neither the Airservices website, where it is published, nor the NFPMS report itself is explicit about who the intended audience for these reports is. There is no reason that most if not all of the 'analysis and discussion' reporting should not be publicly available, in addition to the current 'data only' reports. It is likely to be of great value to the discussions of the Perth Airport's consultative committee, at which the current noise

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<sup>8</sup> Ministerial Direction M37/99, 3 May 1999, *Activities to be performed by Airservices Australia under paragraph 8(1)(d), and for the purposes of subsection 9(2) of the Air Services Act 1995.*

<sup>9</sup> From <http://www.airservicesaustralia.com/aircraftnoise/monitoring-aircraft-noise/>, accessed 14 November 2011

monitoring reports are tabled, and in aiding more broadly public understanding of the aircraft noise picture around Perth.

Community response to these reports is difficult to gauge, however, from those that the ANO has engaged with, most do not seem to have read the reports or consider them helpful or relevant as a reference source. One complainant writes “Why do the [Airservices’] statistics differ so radically from the aircraft impact that I am experiencing?”<sup>10</sup> One submission to this review suggested improving the reports as follows:

*I recommend the release of aggregated trend data information in a format that has community support so that community members can track trend indicators that impact [on] local amenity. For example, community members may be interested in the number of flights that do not adhere to recommended flight heights and the number of flights occurring during night and early morning and whether this trend is improving or otherwise.*<sup>11</sup>

Airservices should consider presenting data in formats that respond to community interests such as that identified above. In addition, where there are trends that can be identified, these should be described and discussed, and anomalies to the trends identified and explained where possible. Where conclusions can be drawn from the data, these should be presented in terms that are meaningful and comprehensible to people who do not have a technical background. Without analysis and discussion presented in simple terms, it is difficult for members of the public who do not have an aviation or acoustics background to interpret the data or draw appropriate conclusions from it. That said, it is also important that the analysis, discussion and conclusions presented remain factual and do not fall into making judgments about the subjective impact for people, as individual experience will always be personal.

To ensure that the reports meet the needs of stakeholders, Airservices should seek feedback on the reports. This need not be a major enterprise as it could be as simple as a note on the reports inviting feedback and providing an easy path to make comments.

**Recommendation 1:** In its ongoing development of public reports on aircraft noise, Airservices should review the reports with the aim of making the reports as easy as possible to understand. This should include using ‘plain English’ in place of technical terminology, considering the usefulness of averages in cases of a wide spread of data, incorporating some analysis of the data, and establishing a simple system for obtaining public feedback on reports.

Where Airservices undertakes temporary noise monitoring studies it would be useful to include in its reporting a discussion about the findings and outline opportunities identified through the study. This could be as part of any separate report at the conclusion of the study or as a section of the standard quarterly reports.

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<sup>10</sup> 14 February 2010, letter to Airservices in ANO complaint ref ANO107

<sup>11</sup> 31 August 2011, submission to this review ref ANOPS02

### 2.1.2.2 Complaints Statistics Report

Airservices has developed a new Complaints Statistics Report for Perth Airport, the first of which covers April 2011 statistics, and was published on the Airservices website on 6 September 2011. The report's purpose is described as follows:

*The data summarised in this report relates to complaints (throughout this report 'complaint' is used to refer to both complaints and enquiries received by the NEU) received by Airservices Australia's Noise Enquiry Unit (NEU) for aircraft operations at Perth Airport during the month of April 2011. It excludes movements from other nearby airports such as Jandakot. The results and analysis in this report reflects the data collected at the time of preparation.*

Additionally, the NCIS sends to Perth Airport and Airservices management a summary of the complaint statistics, which includes the same figures and tables available in the public report but with no commentary/analysis, and which is available within the following month. An extract from the noise complaints database displaying depersonalised data for each complaint/enquiry with limited formatting and no analysis is also provided.

Airservices should be congratulated on the move to provide more useful reporting. This process will be an evolutionary one and there will be further improvements into the future. At this stage, despite the report's purpose being described as including analysis, there is no significant analysis of the data. The text sections are word descriptions of the data presented in the graphs and tables, rather than an analysis of what the data presented means.

Airservices is still in the process of implementing the recommendations from the ANO's *Review of Complaint Handling*. As a result, the Complaints Statistics Report for Perth Airport reflects a lot of complaints from a few complainants making high numbers of separate contacts over the same issue. Given the current presentation is still heavily based on complaint numbers, rather than issues and the number of complainants registering concern with particular issues, this report does not present an accurate picture of the aircraft noise issues and level of concern in the Perth area. (See recommendation 13 from the ANO's *Review of Complaint Handling*.)

Another key aspect of the ANO's *Review of Complaint Handling*, and a focus of this review also, is complaint resolution. The Complaint Statistics Report for Perth Airport does not provide any information or discussion of the complaints that were resolved and how they were resolved. Also not covered is whether any complaints led to identifying that it may be possible to improve the noise outcome, and how these opportunities have been/are being progressed.

It is possible that routinely analysing the noise monitoring data alongside complaint data may provide a means of identifying opportunities for improved public information, opportunities for noise improvements, and/or areas for future noise monitoring studies. Presentation of noise monitoring and complaints information and analysis together may also help members of the public understand the aircraft noise impacts in their area and other areas better. It may also help Airservices and other key stakeholders, such as the Airport consultative committee members, to communicate with affected communities and consider realistic improvements to management of noise concerns.

## 2.2 Using complaints to improve information presentation

Complaints are a valuable channel through which Airservices can determine the information requirements of interested members of the public. In some instances a response to one complainant's specific concerns could be applied more generally and, where appropriate, published on the website (and in hard copy formats for non-web literate stakeholders) to provide additional relevant information for the public. For example, complaints and submissions received by the ANO during this review suggest that clearer information about the following is sought by the Perth community:

- The different roles of each organisation in aircraft noise management, the role of the NCIS in resolving complaints, and the roles of the other aviation stakeholders
- How aircraft noise affects people differently (see for example the *Aircraft noise and its effects* brochure produced by the Western Australian Department of Environment and Conservation and Department of Health<sup>12</sup>).
- How aircraft noise is forecast and measured, including what an ANEF is, how it can be understood and in what ways the information may be helpful/unhelpful for residents understanding the noise situation (see for example, the Discussion Paper produced by the then Federal Department of Transport and Regional Services<sup>13</sup>).
- Where information can be found about the Government's position on key issues such as whether or not Perth Airport should have a curfew, or whether an insulation program will be available in Perth.
- What is noise-sharing and what does it mean in terms of the experience of aircraft noise on the ground?
- What happens as a result of aircraft noise complaints?
- What is the environmental assessment process for changes to flight paths?
- How is the forecast growth in aviation going to affect experiences of aircraft noise?

The other side of using complaints data is to provide information to policy and aviation industry decision-makers. Airservices is in a position to consolidate, analyse, and provide insights to Airservices' management, government, airports, and other stakeholders about the level of concern on particular issues raised in complaints. This is a key part of a feedback loop that supports better aircraft noise management.

**Recommendation 2:** Airservices, in addition to implementing the recommendations from the ANO's *Complaint Handling Review*, should continue to improve information provided to the public and industry, through an increased focus on complaint issues and identifying opportunities for possible improvements in noise outcomes. Public and industry reporting on complaints should provide analysis in addition to the data.

### 2.2.1 Webtrak

The Webtrak tool is an online information service that provides the community with near real-time information and a play-back facility for investigating particular flights around Australia's major airports. It helps community members to see:

- where a flight actually went

<sup>12</sup> *Aircraft noise and its effects*, Prepared by the Government of Western Australia Department of Environment & Conservation and the Department of Health. ([https://www.dec.wa.gov.au/index2.php?option=com\\_docman&task=doc\\_view&gid=2476&Itemid=846](https://www.dec.wa.gov.au/index2.php?option=com_docman&task=doc_view&gid=2476&Itemid=846))

<sup>13</sup> *Expanding Ways to Describe and Assess Aircraft Noise* Discussion Paper, 2000, Department of Transport and Regional Services ([http://www.infrastructure.gov.au/aviation/environmental/transparent\\_noise/expanding/pdf/sep\\_discussion\\_paper.pdf](http://www.infrastructure.gov.au/aviation/environmental/transparent_noise/expanding/pdf/sep_discussion_paper.pdf))

- the background noise levels at noise monitoring locations
- the changes in noise level at the monitors associated with nearby flights.

Community members can lodge a complaint through Webtrak based on a particular flight enquiry, which assists NCIS staff in seeing the flight activity of concern and speeds up registration and response times. In the 18 month period 1 January 2010 – 30 June 2011, the Webtrak system was used by 117 of 973 Perth complainants (i.e. 12%). Webtrak is also a useful tool for complaint-handlers investigating a complaint.

Over the past year, Airservices has undertaken enhancements to the Webtrak tool in response to community feedback and these changes appear to have been well-received. These have included extending the period over which playback is possible, changing measurements from metric to imperial to align with the terminology of other aviation publications, and expanding the geographical range of coverage.

A number of complainants from the Chidlow and Perth hills areas have noted that altitude references in Webtrak, which are in feet above mean sea level (AMSL), are not necessarily helpful. When it comes to the people on the ground, the measure of relevance is altitude above ground level (AGL), but it can be difficult in hilly terrain to establish the exact altitude of a residence. It could nevertheless be beneficial for Airservices to consider options to clarify the relationship between AMSL and AGL.

As Airservices is working with its supplier to continue improvements for Webtrak, no formal recommendation is proposed in this review.

### **2.2.2 Website**

Airservices has recently launched a new website, which restructured and updated the previously available aircraft noise information and included some new links and information. While no longer stated on the website, the previously published objective of the Aircraft Noise website – “This part of our website has been designed to provide both aviation stakeholders and the general public with information about aviation and aircraft noise” (from Airservices website 19 July 2011) – is clearly consistent with Airservices’ role in aircraft noise management. It is therefore very important that Airservices ensures the integrity and credibility of their website through the provision of relevant and accurate information.

The recent enhancements have been positive and again Airservices should be congratulated on the initiative it has taken in this area. Nevertheless, there would be substantial benefit from a strategic review of the aircraft noise information available and development of new, targeted information to meet community needs.

Under the menu item ‘Airport Information’, users can select an Airport of interest from the list of airports at which Airservices provides a permanent noise monitoring service. There are also links to information relating to some ‘secondary airports’. Each airport information page on the Airservices website includes an overview of the airport covering hours of operation/curfew, runway configuration, traffic, and some links to reports and project information relating to the Airport. Providing one website as a source of all aircraft noise information relating to a particular Airport is very useful and therefore more work should be undertaken to ensure it is a comprehensive resource. It would be enhanced, for example by inclusion of links to more detailed sources of information,

inclusion of pictorial/graphical representations of key information, and even case studies to assist in the general public's understanding of key noise issues.

Specifically, at 26 October 2011, the Airport Information website for Perth did not include information (or a link to information) about the latest air route trial, a link to the Perth Webtrak site, or a link to the complaints statistics report. It would also be beneficial to include links to the Perth Airport Noise Management website, the WA government's publication *Aircraft noise and its effects*<sup>14</sup>, the Federal Government's response to the Senate Inquiry, and other links to relevant aircraft noise information – ideally targeted to the key concerns and issues arising from complaints.

In addition, some material was hard to find, with airports not always listed in alphabetical order, no indication when a link will lead to an external website, and often only one path to particular information. Links should be direct to the relevant document/site, wherever possible. For example, the link to the published Noise Abatement Procedures should go directly to the Noise Abatement Procedures publication<sup>15</sup> rather than requiring users to navigate through some five screens containing technical jargon and aviation-specific acronyms that the average user might not be familiar with. Additionally, given the published Noise Abatement Procedures are written for a particular target audience – pilots – the website aimed at a community audience may be better served by providing a clear explanation of the procedures in common lay-person's language.

**Recommendation 3:** Airservices should undertake regular reviews of the information provided on its website and in printed material to ensure that the material is current, relevant to the audience, and responds to feedback from stakeholders.

## 2.3 Coordinated industry approach to information provision

It is likely that the most effective approach to aircraft noise information provision will be achieved through coordination with other aviation stakeholders, as per the suggestion made by Perth Airport management in their submission to this Review:

*Information Access – Ideal Future State: a coordinated industry approach to developing and disseminating aircraft noise information, including organisation role clarity (who is developing and disseminating what)*<sup>16</sup>

A coordinated industry approach will foster consistency and reduce duplicated effort, costs, and the risks of 'buck-passing' (where people enquiring are told to contact someone else and in some cases are referred back and forth between industry organisations or around in a circle). Accordingly, the ANO welcomes the Airservices initiative to work with other aviation stakeholders (e.g. government aviation agencies, major airports, and airlines) to provide a coordinated web resource to educate and inform the community about aircraft noise issues and institute arrangements for working collaboratively to respond to aircraft noise complaints. This initiative may encompass in part the actions proposed in recommendations 1-3 above.

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<sup>14</sup> *Aircraft noise and its effects*, Prepared by the Government of Western Australia Department of Environment and Conservation and the Department of Health. ([https://www.dec.wa.gov.au/index2.php?option=com\\_docman&task=doc\\_view&gid=2476&Itemid=846](https://www.dec.wa.gov.au/index2.php?option=com_docman&task=doc_view&gid=2476&Itemid=846))

<sup>15</sup> <http://www.airservicesaustralia.com/aip/current/dap/PPHNA01-126.pdf>, accessed 14 November 2011

<sup>16</sup> 8 Sep 2011, Submission to this review, ref ANOPS05

## 2.4 Changes in aviation activity

The key issues that arise from complaints, submissions to this review, web logs, letters/articles in the press, and in submissions from Perth residents/groups made to the Senate Inquiry, point to a number of areas where public understanding could be enhanced by improved information about aircraft noise issues. In particular, concerns are expressed about a lack of clear information relating to changes in aviation activity, noise monitoring, insulation, compensation and the health impacts of aircraft noise.

### 2.4.1 What is a change?

A number of complainants to the ANO are frustrated by having been told that there has been 'no change', when they have clearly experienced a change. For example, when Mr M bought his house in Canning Vale in 1983 there were about 1-3 jets that came over his home during the night. Now there are more than 20 some nights<sup>17</sup>.

Aviation activity at Perth Airport has increased significantly due in large part to the resources boom. Airservices has reported that during the 2005-06 financial year 99,636 aircraft movements were recorded at Perth Airport, compared with 131,536 in 2010-11 – an increase of 31,900 or 32% in five years. Residents who did not previously have any serious concerns with aircraft noise, have found the increases now significantly affecting their lives.

In addition, in some cases small changes over time have resulted in a concentration of flights along narrower corridors.

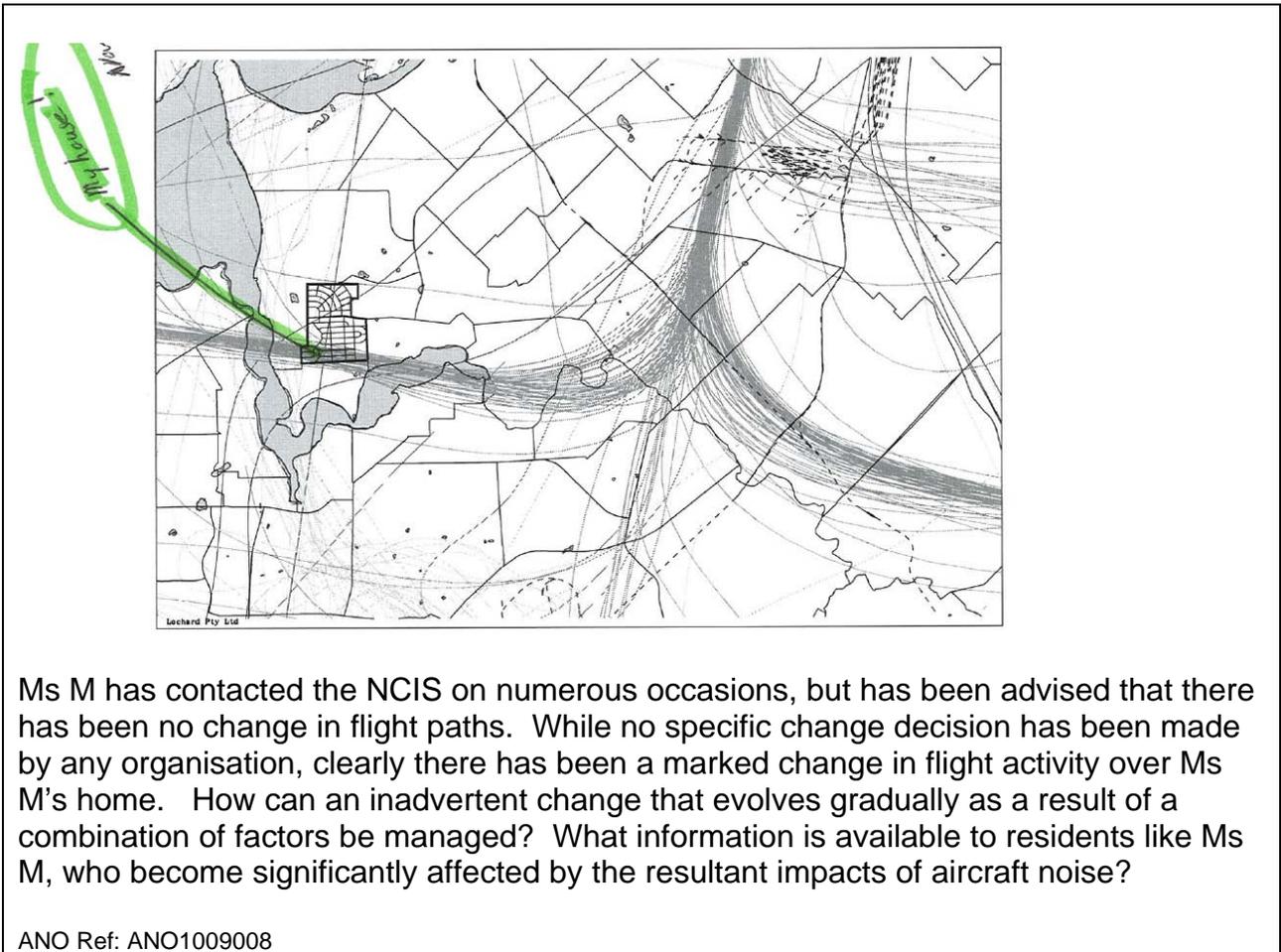
#### Case Study – Now they are all over my house!

Ms M bought a home in Manning, more than 10kms from the Airport and not in line with any runway. In 1997 aircraft overflew irregularly, with a typical day depicted below.



By 2009, there were more aircraft, and almost all track along the same path directly over her home (see below).

<sup>17</sup> ANO Ref: ANO1009003



Given its role in aircraft noise management, Airservices should explain the factors that lead to change in aircraft noise outcomes. This is the case even when some of those factors are not the responsibility of Airservices (for example, airline schedules, aircraft types, airport operations), and/or when no specific change decisions have been made. As well as informing complainants on such issues, Airservices has a responsibility for presenting the outcomes of investigations and any insights about broader aircraft noise issues (such as the case study above demonstrates) to relevant aviation industry stakeholders (airports, airlines, governments). This is with a view to supporting a coordinated industry approach to the management of aircraft noise issues.

### **2.4.2 Consultation**

A submission from a Perth resident to the Senate Inquiry characterised one of the problems with Airservices' consultation as follows:

*The information presented by Airservices on flight paths can be highly technical and this is a deterrent to effective consultation and engagement with members of the public in one off consultative events.<sup>18</sup>*

A key reason for improved information is to increase public understanding about aircraft noise issues, which in turn can aid better management of the issues. Improved levels of community engagement in the issues can lead to both awareness and acceptance of

<sup>18</sup> 14 February 2010, *Submission 146*, Senate Rural and Regional Affairs and Transport Committee Inquiry Report on the effectiveness of Airservices Australia's Management of Aircraft Noise, Parliament of Australia - Senate

the impacts and increased relevance of suggestions for improvements to the noise outcomes.

Issues about consultation arising in the Perth complaints are still in large part focussed on the WARRP changes made in 2008, the amount of increased movements particularly during night and early morning periods, and generally about the impacts of recent runway works at Perth Airport. The problems of consultation around WARRP have been well-documented and Airservices is demonstrating a clear commitment to improving change consultation processes. This is evident through its updated Communications and Consultation Protocol, its participation in Community Aviation Consultation Groups, and through the consultation strategy implemented in support of change initiatives such as the new route trial north of Perth (reviewed in more detail as a case study, in section 3.4 below).

Submissions to the Senate Inquiry highlighted Airservices' reliance on the Perth Airport's community consultation group (Aircraft Noise Management Consultative Committee) for consultation but that the community representatives were neither aviation nor acoustics experts and therefore were heavily reliant on the information presented to them. This concern underlies much of the emphasis in this report on information provision, which in turn becomes a critical component of consultation.

Airservices is working to improve its level of engagement with the community through enhancements to its website and other public communications channels. It is important to balance the need to consult with not over-engineering the consultation processes such that they become impractical and costly to the extent that pursuing small changes that can improve noise or environmental outcomes are inhibited.

During the second half of 2011 the ANO office provided comments on a draft of Airservices' updated Consultation and Communications Protocol. Although the Protocol has only recently been published, the current flight route trial north of Perth has used a consultation model from the Protocol, and does appear to demonstrate that the Protocol can be an effective basis for a change consultation strategy. Effectiveness for a more contentious change will be tested in time.

The ANO commends Airservices on the updated Protocol document, and in particular notes that the new 'method 8: validation of a trial' does allow for small changes to be tried without onerous consultation constraints. The scalability of the Protocol and the variety of methods of communication allow for effective consultation, provided Airservices considers carefully the stakeholder audiences and their needs. In not making a formal recommendation about consultation in this review, the ANO notes that:

- Airservices have made good progress in reforming their consultation processes and practices.
- The ANO office will continue its function of reviewing and monitoring Airservices' consultation processes relating to aircraft noise.

### **2.4.3 Flight path compliance**

A common cause of complaint is that aircraft are not adhering to the approved flight paths, either in terms of aircraft altitudes or aircraft being "off track".

There are many variables affecting exactly where an aircraft may fly in relation to a designated flight path, a number of which are beyond the scope of air traffic control.

Assuring safe separation and sequencing of aircraft are air traffic control matters; however, weather, works on or near the runway, aircraft type and loading, aircraft performance, airline operational guidelines, pilot licensing and currency requirements, and emergencies will also play a part.

It is important that Airservices provide clear information about these variables. In responding to complaints and enquiries, Airservices must ensure that information provided allows the public to understand the expected range of operations that may occur.

### **Case Study: Aircraft flying lower than the flight path**

Mr M in Canning Vale noted that sometimes jets arriving over his suburb were flying up to 1,000 feet lower on some days than on other days and raised numerous Webtrak complaints with the NCIS asking why the flight paths were no longer being complied with, or had they been lowered without due consultation? The complainant was advised that aircraft were tracking within normal tolerances, but was not given a sufficient explanation to assure him that the flight paths had not changed. Nor was the accuracy of the Webtrak presentation made clear, given that there are tolerances within that system that can sometimes give a misleading impression.

When Mr M brought his complaints to the ANO, the ANO's office was able to source information from Airservices about the factors that may affect arrival altitudes over Canning Vale and that provided a basis for estimating the expected range of operations, including allowance for Webtrak accuracy. All but one flight identified in Mr M's complaints were within the expected range. The one flight outside the range was investigated and an explanation provided to Mr M.

Ref: ANO1009003A

The data from the noise monitoring system would provide a reliable historical basis for producing explanatory information and could be used alongside an explanation such as the following:

*Whilst flight paths are often depicted as single lines on a map, it is not possible for all aircraft following a particular flight path to fly precisely along the same line and at the same altitude. In practice, flight paths tend to be corridors that can be a number of kilometres wide and several thousand feet high. In addition both arriving and departing aircraft are sometimes allowed to [or required to] deviate from an established flight path under the direction of Air Traffic Control for various reasons including to maintain prescribed separation distances from other aircraft.<sup>19</sup>*

Where complainants identify operations that fall outside the expected range of operations it is reasonable for them to expect a clear explanation for the activity. Such explanations may point to systemic issues that may be contributing to the variation. These systemic issues could in turn point to a need to modify published information such as the expected range of operations.

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<sup>19</sup> 20 January 2010, from Letter from A/g General Manager Corporate & International Affairs, Airservices Australia to ANO complainant, ref ANO106.

## 2.5 Noise monitoring

The purpose of noise monitoring by Airservices is not clearly understood by the public, nor is the process by which the decisions are made for undertaking temporary noise monitoring studies. This is evident from the requests from individuals for noise monitoring to be installed at their home or in their suburb. There are also many complaints challenging the choice of noise monitoring locations and contradictions noted by complainants comparing the published results with readings they have taken using a hand-held monitor. While Airservices is confident in its monitoring principles, technologies, and methodologies, there is a gap in public understanding and confidence.

Requests for noise monitoring at individual home locations reflect a misunderstanding in the community that once the noise impact is 'scientifically' measured and demonstrable, this evidence will force the government to take action to stop or reduce the noise. Unfortunately, there is contradictory information available on the Airservices website about the purpose of the noise monitors, and their limited role.

### **Case Study: How do I get a Noise Monitoring Terminal placed in my area?**

The above is a "Frequently Asked Question" (FAQ) on Airservices' aircraft noise website. The answer provided<sup>20</sup> is:

*Make a submission to your local Community Aviation Consultation Group. Contact details are available on the Airport Information page. Noise monitors are owned by Airservices. The location of noise monitors are regularly reviewed.*

Unfortunately this answer is inconsistent with the approach presented in the *Review of the Perth Airport Environmental Monitoring Units*, which Airservices undertook during 2010-11 to "assess the location of the current EMUs [Environmental Monitoring Units – Airservices' name for the noise monitors it uses] and make recommendations about the future use of the EMUs". The review was tabled at the December 2010 Perth Airport consultative committee meeting and feedback from the committee was sought. The final report was issued in August 2011, including the following response to feedback.

*EMU locations are a compromise between security, licensing, facilities, background noise level and flight path. Airservices always tries to locate a monitor as close to the flight path as is possible. In general private residence are not used for permanent monitoring locations as these are more likely to change ownership increasing the risk of having to relocate the monitor.*

Airservices owns the noise monitors and makes the decisions about where they are placed. Airservices draws on input from the consultative committee when making these decisions, but it is not a simple case of making a submission and a monitor will be provided in your area as the FAQ answer above suggests. The contradictions in the available material should be clarified and a clear statement of the process and considerations affecting decisions about the location of noise monitors defined.

Noise monitoring results are prominent in the published noise monitoring reports, which are also tabled at the community consultative meetings, and are prominent on Webtrak.

<sup>20</sup> <http://www.airservicesaustralia.com/aircraftnoise/frequently-asked-questions/>, accessed 9 November 2011

This prominence reinforces an inaccurate public perception about the role of noise monitors in the assessment of aircraft noise. In practice, the data used to assess noise impacts, and on which Australian Noise Exposure Forecasts (ANEFs) and Indexes (ANEIs) are based, is modelling, not noise measurements from the network of noise monitors around key airports. Equally the 'N70' charts (usually used to display the annual average number of aircraft noise events that exceed 70 decibels in Airport Master Plans) are also based on modelling, not measurement.

The importance that many complainants put on noise measurement is closely linked to complainants seeking scientific or factual material to support their concerns that aircraft noise is excessive. In practice, individuals experience and perceive noise very differently. Discussion about the raw numbers may be more helpful if context is provided that would shift the emphasis away from precise measurement of noise and on to individual perceptions of noise.

**Recommendation 4:** Airservices should further develop its capacity to provide comprehensive information on all aspects of aircraft noise through NCIS as well as via fact sheets, and its website. This could include such matters as explaining flight paths and why planes fly where they do, explaining changes in air traffic over time (even where there has been no specific action to bring about that change), and explaining the processes for determining the location of aircraft noise monitors and the role of those monitors. It should also include a process for reporting publically on initiatives to improve noise outcomes, including cases where those initiatives result in a conclusion that improvements cannot be achieved.

## 2.6 Insulation and compensation

A number of complainants ask Airservices and the ANO about why there is no funding available from either the Government or the Airport for insulation improvements that would reduce the impacts of aircraft noise at their homes. Many cite the programs in Adelaide, Sydney, and internationally as precedents for such measures and the Senate Inquiry recommended a noise amelioration scheme compensating residents affected by aircraft noise consistent with that of other Australian capital city airports.

Airservices needs to respond clearly on these matters and avoid referring complainants to other parts of government or to members of parliament. As appropriate, Airservices should seek clarification of the Government's position to ensure it can respond directly to complainants on behalf of government.

Some residents are interested in pursuing insulation options in their own right and a number have. Often, noise insulation is also beneficial from an environmental efficiency perspective so there are compelling reasons for residents to consider this option if they are seriously affected by the noise situation in their home. Information about costs and benefits of different insulation options would be useful for interested complainants, and this should be made readily available – see for example publications produced by Perth Airport on insulating existing homes<sup>21</sup> and the WA Government Planning Commission's guide which is instructive about the cost-benefit equation for different types of noise amelioration methods<sup>22</sup>.

<sup>21</sup> May 2005, *Reducing Aircraft Noise in Existing Homes: Information Booklet*, Perth Airport Noise Management Strategy Committee

<sup>22</sup> February 2004, *Aircraft Noise Insulation for Residential Developments in the Vicinity of Perth Airport – Final Report*, published by Western Australian Planning Commission (see in particular Table 7)

A large number of submissions to the ANO make mention of a desire for compensation of some form, including for aspects other than noise insulation. These range from buying out those homes under the flight path so that all traffic can be concentrated in this same area, through to various lesser forms of compensation. Such suggestions/claims include recompense for the cost of: moving (often referring specifically to stamp duty costs of purchasing a different home); loss in property value; loss of income (due to lack of sleep affecting work attendance/performance, day-time noise affecting work from home, aircraft noise restricting operations of business such as a 'bed & breakfast' or artistic retreat); and detrimental health effects.

The key arguments for compensation presented by complainants from the Perth area reference that the changes introduced during WARRP were not forecast and could not reasonably have been anticipated to occur (which has affected some residences not previously affected in the same way by aircraft noise). Complainants note that these changes have been presented to them as irreversible, and that there was poor consultation and consideration of the impacts on residents prior to the changes.

The issue of compensation is not one that the ANO can consider but it is worth noting that there is no precedent in Australia for Government providing the above forms of compensation as part of its program for managing the impacts of aircraft noise and no indication that any model for Government-funded compensation is under consideration.

It is not for this report to comment on such claims beyond noting that in responding to such claims it may be useful to point out that many of the requests for compensation received by the office (and in submissions to the Senate Inquiry) come from residences that are well beyond 10kms from the Airport. Being so far from the Airport would mean that it is very difficult to reasonably assess and quantify the direct impacts that aircraft noise may have had in terms of property prices, amenity, health or loss of income. Further, while it is not possible to return to the airspace configurations in place before the WARRP changes introduced in 2008, it may yet be feasible for changes to be made that may improve aircraft noise impacts, particularly in these areas further from the Airport. In light of these factors there may be value in pointing out to complainants that insulation and compensation schemes may not necessarily be an appropriate response.

The information available from Airservices for members of the public about the availability or otherwise of insulation and the unavailability of compensation has been limited. Airservices may advise that these are matters for Government, and in some cases provide a link to the Department of Infrastructure and Transport's website, where information about the noise amelioration schemes in Sydney and Adelaide can be found. At the same time, the explicit reference to material that provides the Government's position may be more helpful to complainants. For example, the Federal Government's Aviation White Paper, published in December 2009, made the following comments on noise insulation programs:

*The Government recognises the possibility that future major civil airport operations and air traffic changes may place some residences into high noise exposure zones. The Government will develop a framework, in consultation with the industry, for an industry-funded program for civil airports that ensures future insulation projects will be assessed and delivered against world's best practice attenuation initiatives. This will be consistent with the approach taken at Sydney and Adelaide in introducing their noise insulation*

*programs which has provided for insulation measures for public buildings in the 25 Australian Noise Exposure Index (ANEI), for houses in the 30 ANEI and for voluntary acquisition above the 40 ANEI. An improved framework would incorporate, but not be limited to, these measures.*<sup>23</sup>

Further, the Government Response to the Senate Inquiry provides a more recent statement of Government position on noise amelioration schemes for Perth<sup>24</sup>. Airservices' responses and publicly available information need to be as clear as possible on these issues.

**Recommendation 5:** Where complaints/enquiries relate to matters for Government, Airservices should advise complainants of this and, where possible, refer to available material which presents the Government's position. Where complainants wish to pursue their complaints with the Department, Airservices should assist in transferring the complainant directly to the Department.

## 2.7 Home-buyers and renters

Some complainants assert that they could not have known when they bought their homes that they would one day have overflying aircraft, as some changes necessarily occur that were not forecast through the usual planning processes. However, many complainants have been affected by increased activity over their homes that has been in line with forecasts and hence, they could have known, if they had had access to pertinent information at the time they were making their home purchase or renting decision.

The Aviation White Paper states that:

*Readily available and easily understood aircraft noise information is a key noise management tool. Access to comprehensible and up-to-date noise information around airports and under flight paths helps communities understand the impact of aircraft operations and can help avoid unwelcome surprises in experience of aircraft noise a long way from the airport.*<sup>25</sup>

For some locations – e.g. Sydney and Brisbane – Airservices has produced an information package specifically aimed at informing the community of aircraft noise impacts around the relevant area. While Airservices' current information packs for Sydney and Brisbane could be improved by review and renewal, the concept is sound and a similar package should be progressed for Perth. An effective information package will present an accurate aircraft noise information picture to enable a reasonable understanding of the current and forecast aircraft noise situation in Perth. It will draw on relevant information from complaints, the NFPMS, Airport Master Plans, and other relevant data sources, and consolidate and present pertinent information and analysis. Since individual experience differs, it will also include information that explains

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<sup>23</sup> 2009, *National Aviation Policy White Paper: Flight Path to the Future*, Chapter 14, "Noise Disclosure" section, published by Department of Infrastructure, Transport, Regional Development and Local Government

<sup>24</sup> February, 2011, *Government Response – Senate Rural and Regional Affairs and Transport References Committee Inquiry Report on the effectiveness of Airservices Australia's Management of Aircraft Noise*

<sup>25</sup> 2009, *National Aviation Policy White Paper: Flight Path to the Future*, Chapter 14, "Noise Disclosure" section, published by Department of Infrastructure, Transport, Regional Development and Local Government

how aircraft noise affects different people differently. Airservices should make all information packs available on its website.

**Recommendation 6:** Airservices should develop an information package that presents an accurate aircraft noise information picture for Perth, and make this available on its website and in other formats as appropriate.

### **Case Study – Dream home in a whisper-quiet location**

Ms D is an artist, who was seeking a new home in a quiet location out of the city bustle, where she could set up a dance and art studio. She found the perfect home, advertised as being in a ‘whisper-quiet’ location. She visited the home on a number of occasions and, although the home was not new, she was charmed by the tranquillity and the view she had from large windows looking up the valley. Ms D did not know that aircraft operations over the area were significant as her visits to the home had coincided with periods of minimal aircraft activity.

Three days before settlement her conveyance clerk asked her if she was worried about being under a flight path. This was the first she had heard of such a thing and it was basically too late to pull out. Nonetheless she did contact Perth Airport and learnt that the runway affecting her home was second preference for departures, after the first preference main runway, which she wrongly took to mean she would only be affected in emergencies. This seemed acceptable to Ms D, and along with her personal experience at the home several times, she felt reassured that aircraft noise was not something to worry about. Ms D bought her home in Greenmount, a couple of blocks away from one of Airservices’ permanent noise monitoring terminals and directly under the approach path onto the cross runway, which has equal preference for arrivals with the main runway.

In the first quarter after she moved in, Ms D’s home was overflown by 2,598 arriving aircraft flying up the valley and over her home, with an additional 2,863 departures. Of these flights over her new home over three-quarters (4,303, 76.3%) recorded over 70 decibels at the Greenmount noise monitor. Not a single day in the 2<sup>nd</sup> quarter of 2010 passed without at least one noise event recorded at 70 decibels or above.

When Ms D enquired with the Noise Enquiry Unit she was told that she had bought under a flight path and that the patterns experienced are only going to get worse, given the continuing growth of activity at Perth Airport. What can she do, but move?

Ref: ANO072

Obviously there is a ‘buyer/renter beware’ consideration associated with all purchases/leases, and acceptance that real estate agents have to do their job to market a property in such a way as to maximise the sale/lease-price. However, with so many complex considerations for a lay-person to investigate, most home-buyers, like Ms D, rely on engaging a conveyance clerk or equivalent to make the necessary enquiries. Unfortunately, aircraft noise is not a consideration routinely investigated in these enquiry processes, when perhaps it should be. However, there is limited information that even a particularly thorough conveyance clerk could readily source to provide a reasonable picture of the current and forecast aircraft noise situation at a client’s prospective

property. An information package as per the recommendation above would provide a useful resource.

In addition, it may be possible for Airservices to work with its industry stakeholders through the coordinated industry approach to provide a service (under some form of cost-recovery charging regime perhaps) that would produce property-specific or at least suburb-specific information. This could add to the general information package produced by Airservices with maps and charts displaying the exact location of the property and relevant specific aircraft noise impacts and forecasts for the area.

## 2.8 Roles of Airservices, airport operators, and other stakeholders

Airservices is obliged to provide a noise enquiry service and information, data, guidance, and advice about aircraft noise issues. Nevertheless, other stakeholders play a role in informing the public about aircraft noise. Through the requirements of the Airports Act, Perth Airport is required to develop an Environment Strategy which necessarily includes an aircraft noise management strategy. Key to a successful noise management strategy is engagement with affected communities around the airport, and clear, easy to comprehend information provision on aircraft noise issues. A coordinated approach between the Airport and Airservices will improve the timeliness and accuracy of information provided and reduce the negative experience of some complainants being referred back-and-forth between the organisations.

Perth Airport management is keen to engage in a process of coordinated response to communities about aircraft noise, recommending a shared information resource and offering to contribute funds, resources, and expertise towards an 'ideal future state', which includes:

### *Information provision:*

- *A coordinated industry approach to developing and disseminating [aircraft noise] information, including organisation role clarity (who is developing and disseminating what)*
- *Highly legible/intuitive means of information access, maximising use of technology, with high awareness of the means of access*
- *High quality information is available for the full range of needs/appetite for knowledge*
- *Pro-active dissemination of information where changes/events can reasonably be expected to raise concerns*
- *A consistent nationwide approach (Airservices, the Australian Airports Association (AAA) and large airlines are best placed to deliver)*

### *Interaction:*

- *For general inquiries/complaints, one service provider/"port of call" for the public*
- *Timely, accurate responses to enquiries/complaints in a form that is readily understood by recipients*
- *Effective use of inquiry data to identify opportunities to improve information access and/or resolve underlying issues/causes of concern*
- *A consistent nationwide approach (Airservices, AAA and large airlines are best placed to deliver)<sup>26</sup>*

<sup>26</sup> 8 Sep 2011, Submission to this review, ref ANOPS05

Perth Airport management emphasised the need for customer service principles to underpin interactions with the community and for proactive information management.

Airservices and the Australian Airports Association (AAA) have held a number of 'Noise Forums' to look at the issue of managing aircraft noise in a coordinated way. The ANO office has attended these forum meetings, and notes that the next step needs to be agreement to act and the establishment of a team to drive the agreed action. A recent meeting in Adelaide has committed to such a process.

Ultimately this initiative should extend beyond Airservices and Airports to coordination with land use planning agencies at the local and state levels. These agencies must operate within constraints of the WA Planning Commission, which includes obligations for provision of information about the aircraft noise impacts on new developments/subdivisions that are within certain noise exposure forecast contours<sup>27</sup>.

Given the initiative that Airservices is pursuing with the AAA this report does not make further recommendation on this subject. Nevertheless we encourage Airservices to continue and perhaps broaden its efforts in this area over time.

### **3 Resolution of complaints about aircraft noise**

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The first part of this review has been focussed on improving information as a key aspect of improving aircraft noise management. This builds on the ANO's *Complaint Handling Review*, in which the ANO recommended that Airservices shift its focus from complaint recording and reporting to complaint resolution (see in particular recommendations 3, 13, and 15). A key aspect was to improve the processes for identifying and following through on opportunities to improve the noise outcome.

#### **3.1 Assessing options to improve noise outcomes**

Although many of the recommendations from the *Complaint Handling Review* have yet to be fully implemented by Airservices, work is underway to support the shift from complaint recording and reporting to complaint resolution. Complaints can be resolved in three ways:

1. Correct the error or make a change to 'fix' the complaint
2. Where there is no error or change possible to 'fix' the complaint, provide a full and honest explanation in terms comprehensible to the complainant
3. Where there is no error or change possible to 'fix' the complaint in the short-term, but investigation of the complaint points to the possibility of a systemic issue, manage the processes as necessary to investigate further and address the systemic issue.

Opportunities to improve noise outcomes are sometimes resolved in the first way and sometimes in the third. It is critical that opportunities are identified through complaints, and then equally important that a valid assessment process is undertaken to determine if a change can be pursued. The assessment process and the decisions made on the basis of the assessment work must be appropriately open to public scrutiny and accountability, whether the decision is to make a change or not.

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<sup>27</sup> 24 February 2004, *Statement of Planning Policy No. 5.1: Land Use Planning in the Vicinity of Perth Airport*, Western Australian Planning Commission

The assessment process needs to be appropriately scalable to suit the proposed change. Even small changes which may provide only limited improvements are still worth pursuing if there are no readily identifiable negative impacts in a first pass high-level assessment. Using a trial can be a good way of assessing any impacts from a small change, where reverting back to the status quo is feasible should negative impacts become apparent. The ANO was pleased to note the recent release of the Airservices' Communication and Consultation Protocol<sup>28</sup> includes this by way of 'method 8: validating a trial'.

### 3.2 Post-WARRP action

Many Perth complainants to the ANO have sought consideration in light of the changes introduced during WARRP. Revisiting the decisions that led to WARRP is outside the ANO Charter. However, the WARRP Post Implementation Review (PIR)<sup>29</sup>, conducted by Airservices, identified that there were some unexpected environmental outcomes, and a detailed review of these outcomes was undertaken, which included making seven recommendations for further work that may assist in improving the aircraft noise outcomes. These recommendations and Airservices' actions to implement them are of significant interest to communities in the Perth area, and Airservices should make available information about their status.

**Recommendation 7:** Airservices should ensure that it has a clearly defined assessment process for considering possible changes to improve noise outcomes, which should include appropriate public reporting. Such reporting could encompass the WARRP Post Implementation Review.

### 3.3 Changing flight paths

A common example of potential change arising from complaints is a request for a change in flight paths. For example, complainants suggest that the flight paths affecting their area should be moved to reduce the aircraft noise impact in their area. While this could be seen as a 'not in my backyard' approach to the problem, complaints received by the ANO office seeking changes have generally demonstrated a genuine effort to consider the impacts on other areas. A key frustration expressed by complainants is that they have been told it is all too complex and costly and so their suggestions will not even be considered.

#### Case Study – Move Flight Path off Roleystone

Ms H of Roleystone suggested that the flight path that was established during WARRP to overfly Roleystone should be moved some distance to the east and south to overfly unpopulated areas. In response, Ms H was advised:

*Flight path design is a complex process and the existing flight paths are the result of required and extensive consultation, over many years, with all affected stakeholders... Consequently flight paths are not things that can be easily re-directed. Such action could only be considered in the context of the entire airspace design of the region, which may in fact preclude any changes being implemented.*

<sup>28</sup> [http://www.airservicesaustralia.com/wp-content/uploads/Communication-and-Consultation-Protocol\\_WEB.pdf](http://www.airservicesaustralia.com/wp-content/uploads/Communication-and-Consultation-Protocol_WEB.pdf), accessed 9 November 2011

<sup>29</sup> May 2010, *Environmental Post Implementation Review of Changes associated with the Western Australian Route Review Project (WARRP)*, Airservices Australia

In response to enquiries made by the ANO following her complaint to the ANO office, Airservices undertook a preliminary review and advised that there was no technical reason the flight path could not be moved. The ANO requested Airservices undertake a high level feasibility study to examine the operational and other environmental impacts of making such a change to determine at a high level the potential costs and benefits of such a change and therefore the case for proceeding or not. This task has been difficult for Airservices in the absence of a clear process for considering a change not initiated for operational reasons.

To assist, the ANO has developed an outline 'stepped approach' for assessing potential changes, which Airservices is trialling as it considers the changes proposed by Ms H. This work is in progress and the outcome is not yet clear. What is clear, however, is that through this process Airservices will be able to either substantiate the case for change or provide a clear evidence-based explanation for not changing the flight path.

Reference: ANO028

The above case demonstrates the value in Airservices being able to report publicly on its efforts to improve aircraft noise outcomes. Airservices deserves credit for its efforts even where those efforts ultimately prove unsuccessful. Equally, the public is entitled to know that reasonable efforts have been made to explore improved noise outcomes.

### **3.4 How does Airservices identify and assess potential for change?**

One complainant to the ANO, in his submission to the Senate Inquiry stated a problem he perceived:

*Statistics are collected and compiled and reported but Airservices Australia does not consult, explain or act from the evidence resulting.<sup>30</sup>*

The ANO's *Complaint Handling Review* addressed the need for Airservices to seek a suitable remedy for those complaints where it may be possible to improve the noise outcome, and ensure follow up on such opportunities. Complaints and consultation activities are direct feeds to identifying opportunities for improvement.

The Post Implementation Review process for WARRP identified an opportunity that is currently under trial.

#### **Case Study – Perth Trial of New Route for Aircraft**

Airservices is trialling a new flight route that will see a small number of aircraft make use of Royal Australian Air Force (RAAF) airspace when the area is not in use by Defence.

To support this trial of a minor change Airservices has undertaken an extensive consultation program including local press advertisements, a brochure, dedicated email and freecall information/feedback channels, a presentation at the Perth Airport Noise Management Consultation Committee meeting, letters to local, state, and federal

<sup>30</sup> 29 January 2010, *Submission 110*, Senate Rural and Regional Affairs and Transport Committee Inquiry Report on the effectiveness of Airservices Australia's Management of Aircraft Noise, Parliament of Australia - Senate

government representatives, and a webpage including frequently asked questions and the full environment assessment.

The ANO reviewed the information provided to the public and acknowledges the extensive work conducted in putting together the trial. Airservices advises that its early assessment is that this new route is likely to provide a clear, if small, improvement in the noise outcome for those in Beechboro and suburbs west of Beechboro.

Ref: <http://www.airservicesaustralia.com/projectsservices/projects/perthtrial/default.asp>

The ANO commends Airservices for the initiative. The ANO supports the use of a trial as a step to introducing small changes to air routes or other operational changes that may have a noise impact. The trial process, if well managed, can enable not only the trialling of the particular change in an operational and community impact sense, but also to trial modes of engagement with the community, and to inform the information presentation strategies adopted in support of any permanent change.

Airservices has advised that the trial is still in early stages and therefore no conclusions can be drawn about its success or otherwise at this time.

### 3.5 Other change options

Other issues regularly raised by complainants include night restrictions and a desire for noise-sharing. While the Government position on some issues may be available in published material, on other issues the answers may not be as clear. As the agency accountable for aircraft noise management, it is Airservices' role to investigate and seek answers to the concerns about aircraft noise raised with them. Where information is available, Airservices should explain this to complainants in a way that makes sense to them. Where information is not available, Airservices should undertake to seek the information

Complainants need each reasonable suggestion to be responded to with full and honest explanations. If the answer is not known, Airservices should endeavour to find out an answer. In some cases, the answer can not be known until a significant piece of work – for example a trial of new arrangements – is completed and assessed. This is likely to take a long time. Nonetheless, it is important that a stepped consideration be undertaken and that progress, and ultimately the outcome, is advised to relevant complainants. Complaints should not be considered resolved until an answer is provided. Further, where appropriate, Airservices should consider advising relevant stakeholders (such as the Airport consultative committee) and publishing on their website and in other relevant forms the outcome of such considerations.

## 4 Managerial responsibility for aircraft noise communications

Airservices' management instruction MI-0611 states "Corporate & International Affairs group is accountable for Communication Activities"<sup>31</sup> This document states that "All Airservices staff must receive approval from the Manager, Corporate Communication, or his [sic] delegate, for all proposed Internal and External Communication Activities [defined as including the "extranet"]". Under the heading "Web material", this document states "Business units seeking to place material on the Airservices website should

<sup>31</sup> Issued 6 October 2010, MI-0611: *Management Instruction: Internal and External Communications Activities*, Airservices Australia

contact the Web & Design Services team, who will liaise with Corporate Communications on content as appropriate.”

In response to direct questions about the managerial responsibility for aircraft noise information on Airservices’ external website, Airservices advised:

- *General Manager, Environment is accountable for the aircraft noise information on Airservices’ external website*
- *Airservices is in the process of establishing an appropriate protocol for the review and update of aircraft noise information on Airservices’ external website. Information requiring regular changes (e.g. ‘Noise News’) is reviewed on a weekly basis.*
- *Whilst the protocol mentioned above is still being formalised, a change to the information on the website (such as Noise News) is authorised by the NCIS Team Leader, and more significant changes to other content or the structure of the information is authorised by Manager, Environmental Services.*

This is a pleasing response and, through monitoring, the ANO has noted that external website updates have proceeded, resulting in a more up-to-date presentation of aircraft noise information.

Other forms of aircraft noise communications include NCIS responses to complaints, representations at Community Aviation Consultation Group (CACG) meetings, comments to media, and release of reports. The Complaint Handling Review addressed the first of these. The requirement for Airservices’ representation at CACG meetings is reinforced by the Government Response to the Senate Inquiry and those representing Airservices are clearly accountable for the information they provide to these meetings. Airservices also has Management Instructions (MI-0611 and MI-0608) which define accountabilities for media engagement and release of public information.

Given Airservices’ advice that it is in the process of establishing an appropriate protocol for the review and update of aircraft noise information on Airservices’ external website, no formal recommendation on this issue is proposed in this review.

## 5 Implementing the recommendations of this review

This review makes recommendations (summarised at Attachment 1) about how Airservices can improve public understanding about aircraft noise by improving its presentation of information and being accountable for the decisions it makes (including decisions not to make a change) that affect the aircraft noise situation. Should Airservices accept these recommendations it will assist the public if information is made available on progress in implementation.

## Attachment 1 – Summary of recommendations

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**Recommendation 1:** In its ongoing development of public reports on aircraft noise, Airservices should review the reports with the aim of making the reports as easy as possible to understand. This should include using ‘plain English’ in place of technical terminology, considering the usefulness of averages in cases of a wide spread of data, incorporating some analysis of the data, and establishing a simple system for obtaining public feedback on reports.

**Recommendation 2:** Airservices, in addition to implementing the recommendations from the ANO’s *Complaint Handling Review*, should continue to improve information provided to the public and industry, through an increased focus on complaint issues and identifying opportunities for possible improvements in noise outcomes. Public and industry reporting on complaints should provide analysis in addition to the data.

**Recommendation 3:** Airservices should undertake regular reviews of the information provided on its website and in printed material to ensure that the material is current, relevant to the audience, and responds to feedback from stakeholders.

**Recommendation 4:** Airservices should further develop its capacity to provide comprehensive information on all aspects of aircraft noise through NCIS as well as via fact sheets, and its website. This could include such matters as explaining flight paths and why planes fly where they do, explaining changes in air traffic over time (even where there has been no specific action to bring about that change), and explaining the processes for determining the location of aircraft noise monitors and the role of those monitors. It should also include a process for reporting publically on initiatives to improve noise outcomes, including cases where those initiatives result in a conclusion that improvements cannot be achieved.

**Recommendation 5:** Where complaints/enquiries relate to matters for Government, Airservices should advise complainants of this and, where possible, refer to available material which presents the Government’s position. Where complainants wish to pursue their complaints with the Department, Airservices should assist in transferring the complainant directly to the Department.

**Recommendation 6:** Airservices should develop an information package that presents an accurate aircraft noise information picture for Perth, and make this available on its website and in other formats as appropriate.

**Recommendation 7:** Airservices should ensure that it has a clearly defined assessment process for considering possible changes to improve noise outcomes, which should include appropriate public reporting. Such reporting could encompass the WARRP Post Implementation Review.

## Attachment 2 – Terms of Reference

<b>Review Objectives</b>	<p>In line with the ANO Charter, the review will address concerns raised by a number of residents, interest groups and other stakeholders in Perth about how Airservices Australia can improve:</p> <ol style="list-style-type: none"> <li>1. public understanding and information about aircraft noise issues</li> <li>2. resolution of complaints about aircraft noise, including the identification and management of improvements to aircraft noise outcomes.</li> </ol> <p>While this review will focus specifically on Perth, it is anticipated that some findings may have a broader application.</p>	
<b>Review Scope</b>	<p>The review will identify, consider and make recommendations as appropriate on the review objectives:</p> <ol style="list-style-type: none"> <li>1. to improve public understanding and information about aircraft noise issues: <ol style="list-style-type: none"> <li>a. review currently available information about aircraft noise and its presentation/distribution, and examine options to improve the methods of explaining aircraft noise issues to the public</li> <li>b. consider feedback from complaints and other available indicators of public understanding and reactions to identify opportunities to improve information and understanding about aircraft noise</li> <li>c. consider the relationship between the different roles of Airservices Australia, airport operators and other stakeholders in providing information about aircraft noise</li> </ol> </li> <li>2. to improve resolution of complaints about aircraft noise: <ol style="list-style-type: none"> <li>a. examine how options to improve noise outcomes are considered, and in particular consider how possible small changes to the management of air traffic over Perth are considered and assessed</li> <li>b. examine the allocation of managerial responsibility within Airservices Australia for aircraft noise communications</li> </ol> </li> </ol> <p>The review will draw on information available from, but not re-investigate matters already specifically considered by, the Senate Rural and Regional Affairs and Transport References Committee Inquiry on the effectiveness of Airservices Australia's Management of Aircraft Noise.</p>	
<b>Report issue</b>	Draft: September 2011	Final: November 2011